

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

Karenza Clincy, Erica Hammond,
Jammie Parker, Kiesha Pough,
Kimberly Jordan, Naturee Wells,
Monica Leaphart, and Summer Sales,
Individually and on behalf of others similarly situated,

Plaintiffs,

v.

Galardi South Enterprises, Inc. d/b/a/ The Onyx,
Galardi South Enterprises Consulting, Inc. d/b/a/ The Onyx,
Michael Kapp and Jack Galardi,

Defendants.

Court File No. 09-CV-2082 (RWS)

PLAINTIFFS' MOTION FOR CONDITIONAL CLASS CERTIFICATION

Now come Plaintiffs in the above captioned matter, by counsel and move this court to conditionally certify a class consisting of all individuals who have worked as entertainers at Club Onyx, located at 1888 Cheshire Bridge Road, Atlanta, Georgia during the three years (plus any period of equitable tolling) prior to the sending of judicially authorized notice in this case. Plaintiffs request this Court to send judicial notice of the action informing putative collective members of their right to join this action. Plaintiffs also request this Court to order Defendants to produce an electronic list of all individuals who worked as

entertainers at Defendants' nightclub during the applicable time period in order to facilitate the sending of such notice. This motion is made pursuant to the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.*

Dated: August 20, 2009

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